

Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

February 15, 2021

Judge Aaron,

This letter is responsive to your order of February 12, 2021 (ECF No. 195). Specifically, with regard to the discovery items sent along with Defendant's Answer to Supplemented Second Amended Complaint (ECF No. 189). I composed and sent that brief as ordered on February 7, 2021 along with three other filings. Those included Defendant Jason Goodman Response to interrogatories, Defendant Jason Goodman's interrogatories and Defendant Jason Goodman Document Requests (**EXHIBIT A**).

As of April 2020, in response to the Covid 19 crisis the court has created the Temporary Pro Se filing system. Immediately upon my submission of four separate emails, each containing PDF attachments in compliance with the temporary filing rules, I received an acknowledgement of receipt for each item. (**EXHIBIT B**) Copies of each have also been mailed to Plaintiff at General Delivery Rough and Ready CA, 95975 as this is the address of record for Plaintiff with the court and can be provided as evidence once returned by the USPS.

Upon realizing only one of the four documents were docketed on February 8, 2021, Defendant contacted the pro se office by phone and spoke with a clerk who advised Defendant that since these were discovery items, they could not be added to the docket.

As you are aware, on October 19, 2018 Plaintiff made an extensive filing in which he objected strenuously to electronic service from Defendant, (ECF No. 42) alleging malintent and suggesting Defendant had somehow tampered with the documents or otherwise included

clandestine, malicious software in the filings. Defendant does not possess the knowledge or ability to do such a thing and further swears under penalty of perjury that no such action was taken. Due to Defendant's perception that Plaintiff has acted in bad faith throughout these proceedings, the PDF attached to the email was "read only" password protected to prevent editing. This is a standard function of Adobe PDF software and while Defendant knows how to use the software to create a PDF from Microsoft Word, Defendant does not have a clear understanding of exactly what it does or how it operates. On information and belief, Defendant alleges this password protected document allowed Plaintiff, who is an IT and computer security expert, to generate false evidence in support of his claim alleging a potential security threat. Those 2018 filings were emailed to Plaintiff in an effort to overcome what Defendant further alleges is an ongoing, deliberate effort to obstruct service.

In response to your most recent order, and after close of business on Friday February 12, 2021, Plaintiff began emailing Defendant at 6:25pm eastern, in an apparent attempt to negotiate acceptance of electronic service. **(EXHIBIT C)** No explanation was given for this dramatic change of policy aside from "courtesy" to Defendant. Plaintiff sent this message with full knowledge that Defendant is presently traveling cross country via car and not able to promptly read or respond to emails, especially outside of business hours when such official communications are not expected. An additional message was sent on February 14, 2021 **(EXHIBIT D)** in which Plaintiff provides yet another General Delivery Post office address. As evidenced by two US Post Offices' refusal to deliver mail in the way Plaintiff believes it should be, Defendant has no confidence that mail sent to this address will reach Plaintiff. Plaintiff continues to defy the instructions of the US Postal Service by improperly applying for a PO Box or delivery address. Plaintiff has failed to provide a legitimate, legal mailing address throughout

these proceedings. Plaintiff continues to obstruct service of the discovery materials. Defendant further requests that the court compel the Plaintiff to show cause as to why he no longer has security concerns with regard to electronic service.

As you are also aware, on or around October 2019, the court extended the courtesy of allowing parties to communicate directly with chambers via Aaron_NYSDChambers@nysd.uscourts.gov. Upon the immediate abuse of this courtesy by associates of Plaintiff, Steve Outtrim and Marcus Conte, this privilege was understandably revoked.

Due to this collection of circumstances, Defendant did not know how to properly transmit the discovery documents to the court. Defendant stands prepared to provide the documents to chambers via email, US mail, or any other means preferred by the court. Defendant also welcomes clarification with regard to this proposed new address for Plaintiff. It is presently Defendant's understanding that the court must first be alerted by motion of a change of address before documents can be served. Defendant will await further instruction from the court.

I hereby attest that the pleadings herein are accurate and true under penalties of perjury. Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described.

Respectfully submitted this 15th day of February 2021

A handwritten signature in black ink, appearing to read 'J. Goodman', with a long horizontal stroke extending to the right.

Jason Goodman
Defendant Pro Se
252 7th Avenue #6s
New York, NY 10001
truth@crowdsourcethetruth.org
323-744-7594

(EXHIBIT A)

From: Jason Goodman truth@crowdsourcethetruth.org
Subject: Pro Se Filing – 1:18-cv-08653-VEC-SDA from Defendant Jason Goodman Defendant's Response to Motion to compel
Date: February 7, 2021 at 11:56 PM
To: temporary_pro_se_filing@nysd.uscourts.gov

JG



Defendant's
Respo...ell.pdf

From: Jason Goodman truth@crowdsourcethetruth.org
Subject: Pro Se Filing – 1:18-cv-08653-VEC-SDA from Defendant Jason Goodman Response to interrogatories
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Response to
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JG



Defendant's first
interog...ies.pdf

(EXHIBIT B)

All Mailboxes (Found 7 matches for search)

FROM: T. Pro Se Filing NYSD

Sort by Date

Temporary Pro Se Filing NYSD 2/7/21, 11:56 PM
 Acknowledgment of Receipt. Inbox - truth@crowdsourcethetruth.org
 Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

Temporary Pro Se Filing NYSD 2/7/21, 11:56 PM
 Acknowledgment of Receipt. Inbox - truth@crowdsourcethetruth.org
 Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

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 Acknowledgment of Receipt. Inbox - truth@crowdsourcethetruth.org
 Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

Temporary Pro Se Filing NYSD 1/28/21, 10:27 PM
 Acknowledgment of Receipt. Inbox - truth@crowdsourcethetruth.org
 Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

Temporary Pro Se Filing NYSD 1/28/21, 2:24 PM
 Acknowledgment of Receipt. Inbox - truth@crowdsourcethetruth.org
 Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

Temporary Pro Se Filing NYSD 11/19/20, 4:46 PM
 Automatic reply: Case 1. Inbox - truth@crowdsourcethetruth.org
 Acknowledgment of Receipt: Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York.

Temporary Pro Se Filing NYSD
 Acknowledgment of Receipt
 To: Jason Goodman
 February 7, 2021 at 11:56 PM

Your email has been received by the Pro Se Intake Unit of the United States District Court for the Southern District of New York. (This is not the United States Bankruptcy Court.) Documents from pro se litigants that meet the required standards for electronic filing will be filed and will appear on the ECF docket within two business days of receipt (see required standards below). If you send your document by email and it is accepted for filing, you should not deliver a hard copy version to the court.

Required Standards for Filing by Email:

- Documents must be attached to the email in PDF format, no larger than 10 megabytes;
- The email and attached document must contain the case number, filer's name, address, and telephone number;
- Documents must be signed by the filing party by either
 - (a) signing by hand and then scanning the document;
 - (b) signing electronically using a digital signature; or
 - (c) by typing: "s/Filer's Name;"
- Any additional comments, questions, or other messages in the email will be disregarded;
- Any additional correspondence included in the email will be disregarded.

If your document does not appear on the ECF docket within two business days, it has not met the required standards for electronic filing. If so, you must submit your document to the court in paper form by (a) sending your document by mail, or overnight delivery service, to the appropriate courthouse listed below; or (b) delivering your document in-person to the appropriate courthouse listed below between the hours of 9:30 AM to 1:00 PM; or (c) depositing your document after hours in the court's night depository box at the 500 Pearl Street, NY, NY courthouse.

United States Courthouse
 Pro Se Intake Unit
 500 Pearl Street
 New York, NY 10007

or

United States Courthouse
 Pro Se Intake Unit
 300 Quarropas Street
 White Plains, NY 10601

For more information on the Standards for Filing by Email go to: <https://nysd.uscourts.gov/sites/default/files/pdf/covid-19/Notice%20-%20Pro%20Se%20Email.pdf>.

You can receive notifications by email of activity in your case by consenting to receive documents electronically. To do so, complete and mail the form found at <https://nysd.uscourts.gov/forms/consent-electronic-service-pro-se-cases>.

(EXHIBIT C)

From: Spoliation Notice spoliation-notice@mailbox.org 

Subject: JUDGE'S ORDER FOR DISCOVERY

Date: February 12, 2021 at 6:25 PM

To: Jason Goodman truth@crowdsourcethetruth.org, Spoliation Notice spoliation-notice@mailbox.org

DS

Dear Sir,

1. You have stated that you are on the road in a nationwide "road show" on numerous video podcasts.
2. As a courtesy to you I have attached the magistrate judge's ruling that orders your compliance with his 12/7/2020 order (both are attached).
3. Pursuant to the magistrate's order of today's date you should deliver discovery materials to this address at once:

D. GEORGE SWEIGERT, c/o
TRANSIENT HOLD
GENERAL DELIVERY
U.S. POST OFFICE
200 COYOTE STREET
NEVADA CITY, CA 95959-9998
SPOLIATION-NOTICE@MAILBOX.ORG

4. A copy of this e-mail message shall be filed with the Court attached to a second Motion to Compel Discovery if these discovery materials are not delivered by 2/22/2021.

Best,



D. Geo. Sweigert show_temp-
change...ess.pdf



sweigert-v-
goodm...20.pdf

From: **Spoliation Notice** spoliation-notice@mailbox.org
Subject: Re: JUDGE'S ORDER FOR DISCOVERY
Date: February 12, 2021 at 6:49 PM
To: Jason Goodman truth@crowdsourcethetruth.org, Spoliation Notice spoliation-notice@mailbox.org

Supplemental Message

If you would care to transmit this discovery via Internet e-mail messages we can attempt that exchange via this e-mail address.

However, if you are interested in this process, you must agree to this approach prior to midnight (PST) 2/13/2021 by return e-mail message.

Best,

D. Geo. Sweigert

On 02/13/2021 12:25 AM Spoliation Notice <spoliation-notice@mailbox.org> wrote:

Dear Sir,

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D. Geo. Sweigert

(EXHIBIT D)

From: **Spoliation Notice** spoliation-notice@mailbox.org
Subject: Re: JUDGE'S ORDER FOR DISCOVERY
Date: February 14, 2021 at 12:24 PM
To: Jason Goodman truth@crowdsourcethetruth.org, Spoliation Notice spoliation-notice@mailbox.org

To: Jason Goodman

1. As you are well aware, the deadline for you to communicate your cooperation to produce discovery via electronic means has come and gone.
2. After consultation with the U.S. Postal Service authorities, they have advised that this is a valid U.S. mail address:

D. George Sweigert
General Delivery
Nevada City, CA 95959
3. The Court will be advised of this e-mail message and that you are presently "on the road" at the Port of Charleston, S.C.

Best,

D. Geo. Sweigert

On 02/13/2021 12:48 AM Spoliation Notice <spoliation-notice@mailbox.org> wrote:

Supplemental Message

If you would care to transmit this discovery via Internet e-mail messages we can attempt that exchange via this e-mail address.

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